Mr. Jack Hamner Ferro Corporation, Keil Chemical 3000 Sheffield Avenue Hammond, IN 46327

Dear Mr. Hamner:

Re: Exempt Construction and Operation Status, 089-16055-00227

The application from Keil Chemical, received on May 29. 2002, has been reviewed. There are no collateral emissions from the scrubbers. Pursuant to 326 IAC 2-1.1-1(6) the replacement of an air pollution control device at an existing source is a minor physical change. Based on the data submitted and the provisions in Section 3 of 326 IAC 2-1.1-3(h)(2), it has been determined that the replacement of two existing sulfurization scrubbers, to be located at 3000 Sheffield Avenue, Indiana, is classified as exempt from air pollution permit requirements:

(a) Two (2) Celicote Air Pollution Control caustic scrubbers, Model SPT-24-84, with a nominal efficiency of removing 99% by weight gaseous hydrogen sulfide, and volatile organic compounds (VOC), at1500 acfm at 150°F with a recycle rate of approximately 90 GPM at 10 psig.

This existing source has submitted their Part 70 application T089-7797-00227 on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Any change or modification, which may cause an increase in net emissions of VOC or hydrogen sulfide from the equipment being controlled by these sulfurization scrubbers, may need an approval from the Office of Air Quality (OAQ).

Sincerely,

Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality

TPS

cc: File - Lake County
Lake County Health Department
Northwest Regional Office
Permit Tracking
Air Programs Section- Nancy Landau
Hammond Department of Environmental Management
TV File - T-089-7797-00227